

EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
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**EXHIBIT LIST FOR HEARING ON MOTION FOR SANCTIONS AGAINST
WILLIAM KUNTZ III**

Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan Of Lehman Brothers Holdings Inc. And Its Affiliated Debtors [Docket No. 23023-1] (the “Plan”), submits this exhibit list (the “Exhibit List”) in connection with the hearing on the *Motion For Sanctions Against William Kuntz III* [Docket No. 52113] (the “Sanctions Motion”), scheduled on March 4, 2016 at 3:00 p.m. (Eastern Time), before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

EXHIBITS

LBHI intends to introduce as exhibits at the hearing those exhibits enumerated herein, as well as any other exhibits listed by any other party or necessary to rebut or counter any exhibits proffered by any other party.¹

¹ In support of the Exhibit List, LBHI submits the (i) *Declaration Of Tyler Whitmer*; (ii) *Declaration of Benjamin Odell*; and (iii) *Declaration of William Pugh* attached as Exhibits 1 through 3, respectively.

Exhibit ²	Description ³	Offered (Yes/No)	Admitted (Yes/No)
Category 1: Declarations			
1	Declaration Of Tyler Whitmer		
2	Declaration Of Benjamin Odell		
3	Declaration Of William Pugh		
Category 2: Correspondence From W. Kuntz			
4	Facsimile from W. Kuntz to H. Novikoff <u>et al.</u> dated Feb. 6, 2016 (LEHMAN BROTHERS HOLDINGS Inc., <i>et al.</i> Chapter 11 Case No. 08-13555 JPM SETTLEMENT MATTER)		
5	Facsimile from W. Kuntz to H. Novikoff <u>et al.</u> dated Feb. 13, 2016 (LEHMAN BROTHERS HOLDINGS Inc., <i>et al.</i> Chapter 11 Case No. 08-13555 JPM SETTLEMENT MATTER)		
6	Facsimile from W. Kuntz to Quinn Emanuel Urquhart & Sullivan, LLP <u>et al.</u> dated Feb. 17, 2016 (Re: Lehman)		
7	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 19, 2016 (your Lehman email)		
8	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 19, 2016 (In re Lehman Brothers Holdings Inc., et al., Case No. 08-13555 (SCC))		
9	Facsimile from W. Kuntz to W. Pugh dated Feb. 19, 2016 (Re: Lehman Brothers)		
10	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 22, 2016 (Re: your Lehman email)		
11	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 23, 2016 (Re: In re Lehman Brothers Holdings Inc., et al., Case No. 08-13555 (SCC))		
12	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 23, 2016 (relatively little has been written about Kasich's role at Lehman Brothers)		
13	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 23, 2016 (have you really thought clearly just about what you are doing? for example, just where is the email you allege i sent the court? otherwise how do you spell perjury? you created this mudpile so why are you now crying about it?)		
14	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 23, 2016 (pacer)		

² The referenced documents incorporate all attachments and exhibits annexed thereto and, further, any document to which the referenced document is attached.

³ In the event that a document contains multiple e-mails, the document is identified by the most recent e-mail (*i.e.*, the e-mail with the latest date and time on the chain).

Exhibit ²	Description ³	Offered (Yes/No)	Admitted (Yes/No)
15	Email from W. Kuntz to B. Odell dated Feb. 23, 2016 (?)		
16	Email from W. Kuntz to B. Odell dated Feb. 23, 2016 (but sometimes the worst problems just can't be planned for)		
17	Email from W. Kuntz to B. Odell dated Feb. 23, 2016 (Investor Protection Bureau)		
18	Email from W. Kuntz to B. Odell dated Feb. 23, 2016 (IN RE W.T. GRANT CO.)		
19	Email from W. Kuntz to B. Odell dated Feb. 23, 2016 (emerald express beached after storm)		
20	Email from W. Kuntz to B. Odell dated Feb. 24, 2016 (email)		
21	Email from W. Kuntz to B. Odell dated Feb. 24, 2016 (unanticipated problem?)		
22	Email from W. Kuntz to B. Odell dated Feb. 24, 2016 (unanticipated problem?)		
23	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 24, 2016 (docket # 1261 exhibit #4 NY State Comptroller's account 033073395/02713967 Lehman Brothers Holdings, Inc)		
24	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Feb. 24, 2016 (On Considering the Public Interest in Bankruptcy: Who Decides What Best Serves the Public Interest? Noneconomic Interests in Bankruptcy: Standing on the Outside Looking In)		
25	Letter from W. Kuntz to Hon. S. Chapman dated Feb. 25, 2016 (Re: Lehman/JPMorgan Settlement Case 09-13555 ch 11 (scc))		
26	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Mar. 2, 2016 (court again? i guess i will miss my chainsaw sharpening class up back here in the ice and snow of northern ny)		
27	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Mar. 2, 2016 (accountable mail? a terms used by the us post office)		
28	Email from W. Kuntz to T. Whitmer <u>et al.</u> dated Mar. 3, 2016 (german press on lehman brothers [OMITTED])		
Category 2: Communications to W. Kuntz			
29	Email from W. Pugh to W. Kuntz dated Feb. 16, 2016 (In re Lehman Brothers Holdings Inc., et al., Case No. 08-13555 (JMP))		
30	Email from T. Whitmer to W. Kuntz dated Feb. 17, 2016 (In re Lehman Brothers Holdings Inc., et al., Case No. 08-13555 (JMP))		
31	Email from W. Pugh to W. Kuntz dated Feb. 19, 2016 (In re Lehman Brothers Holdings Inc., et al., Case No. 08-13555		

Exhibit ²	Description ³	Offered (Yes/No)	Admitted (Yes/No)
	(SCC)) (CC: T. Whitmer)		
32	Email from B. Odell to W. Kuntz dated Feb. 23, 2016 (William Kuntz III v. Lehman Brothers Holdings Inc. and Official Committee of Unsecured Creditors, No. 16-cv-01379(LAK)) (CC: T. Whitmer)		
33	Email from B. Odell to W. Kuntz dated Feb. 24, 2016 (In re Lehman Brothers Holdings Inc., Chapter 11 Case No. 08-13555(SCC)) (CC: T. Whitmer)		
34	Email from B. Odell to W. Kuntz dated Feb. 25, 2016 (William Kuntz III v. Lehman Brothers Holdings Inc. and Official Committee of Unsecured Creditors, No. 16-cv-01379(RJS))		
35	Email from B. Odell to W. Kuntz dated Feb. 25, 2016 (William Kuntz III v. Lehman Brothers Holdings Inc. and Official Committee of Unsecured Creditors, No. 16-01379(RJS))		
36	Email from B. Odell to W. Kuntz dated Feb. 25, 2016 (William Kuntz III v. Lehman Brothers Holdings Inc. and Official Committee of Unsecured Creditors, No. 16-cv-01379(RJS))		
Category 3: Other Documents			
37	Copy of Claims Register reflecting the expungement of the claims of W. Kuntz (Nos. 10509, 10510, 10511, 33550, 33551, 33552, 35120, 35121, 35122, 35123, 35340)		
38	March 1, 2016 Hr'g Tr. (Hearing re: Status Conference on Doc #52113 Motion for Sanctions Against William Kuntz III)		
39	Copy of Electronic Docket reflecting the filings of W. Kuntz and related documents in the Bankruptcy Cases		
Category 4: Publicly Filed Documents⁴			
40	Motion Of Lehman Brothers Holdings Inc. And Official Committee Of Unsecured Creditors, Pursuant To Fed. R. Bankr. P. 910 And 11 U.S.C. § 105(a), For Entry Of Order Approving Settlement Agreement With JPMorgan Chase Bank, N.A. And Certain Of Its Affiliates With Respect To Avoidance Action And Derivatives Claims Objections And Granting Related Relief, Jan. 25, 2016, ECF No. 51904		
41	Certificate Of No Objection Under 28 U.S.C. § 1746		

⁴ Given that the documents listed hereunder are available on the Court's electronic docket, LBHI is not attaching these documents to the Exhibit List. LBHI will, however, provide the Court and Mr. Kuntz with a binder containing a complete set of all documents listed herein.

Exhibit ²	Description ³	Offered (Yes/No)	Admitted (Yes/No)
	Regarding Motion Of Lehman Brothers Holdings Inc. And Official Committee Of Unsecured Creditors, Pursuant To Fed. R. Bankr. P. 910 And 11 U.S.C. § 105(a), For Entry Of Order Approving Settlement Agreement With JPMorgan Chase Bank, N.A. And Certain Of Its Affiliates With Respect To Avoidance Action And Derivatives Claims Objections And Granting Related Relief, Feb. 4, 2016, ECF No. 51963		
42	Letter from W. Kuntz to Hon. S. Chapman dated Jan. 30, 2016 (RE: LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , Case No. 08-13555 JP MORGAN CHASE SETTLEMENT), ECF No. 51973		
43	Order Granting Motion Of Lehman Brothers Holdings Inc. And Official Committee Of Unsecured Creditors, Pursuant To Fed. R. Bankr. P. 910 And 11 U.S.C. § 105(a), For Entry Of Order Approving Settlement Agreement With JPMorgan Chase Bank, N.A. And Certain Of Its Affiliates With Respect To Avoidance Action And Derivatives Claims Objections And Granting Related Relief, Feb. 11, 2016, ECF No. 52002		
44	Opposition To Application For Enlargement Of Time Within Which To File A Notice Of Appeal From JPM Settlement Agreement, Feb. 16, 2016, ECF No. 52027		
45	Certificate Of Service, Feb. 16, 2016, ECF No. 52031		
46	Notice Of Motion/Motion For Enlargement Of Time Within Which To File An [sic] Notice Of Appeal To The JPM Chase Settlement Agreement, Feb. 17, 2016, ECF No. 52035		
47	Order Denying Application For Enlargement Of Time Within Which To File A Notice Of Appeal From JPM Settlement Agreement, Feb. 18, 2016, ECF No. 52086		
48	[Purported] Notice Of Appeal, Feb. 18, 2016, ECF No. 52096		
49	Notice Of Hearing On Motion For Sanctions Against William Kuntz III, Feb. 19, 2016, ECF No. 52107		
50	Motion For Sanctions Against William Kuntz III, Feb. 19, 2016, ECF No. 52113		
51	Letter from A. Rossman to Hon. S. Chapman dated Feb. 19, 2016 (RE: <i>In re Lehman Brothers Holdings Inc.</i> (Case No. 08-13555): Motion for Sanctions Against William Kuntz III), ECF No. 52117		
52	Brief Memorandum In Support Of Motion To Enlarge Time, Feb. 17, 2016, ECF No. 52124		
53	Certificate Of Service, Feb. 19, 2016, ECF No. 52151		
54	Notice Of Court Conference, Feb. 24, 2016, ECF No. 52197		

Exhibit²	Description³	Offered (Yes/No)	Admitted (Yes/No)
55	Certificate Of Service, Feb. 24, 2016, ECF No. 52198		
56	Certificate Of Service, Feb. 24, 2016, ECF No. 52199		
57	Notice Of Motion/Motion To Enlarge Time, Feb. 29, 2016, ECF No. 52229		
58	Unknown Filing By W. Kuntz, Feb. 29, 2016, ECF 52230		
59	Amended Notice Of Hearing On Motion For Sanctions Against William Kuntz II, Mar. 1, 2016, ECF No. 52231		
60	Suggestion Of Recusal, Mar. 1, 2016, ECF No. 52232		
61	Order, Mar. 2, 2016, ECF No. 52236		
62	Letter from W. Kuntz to Hon. S. Chapman dated Feb. 25, 2016 (Re: Lehman/JPMorgan Settlement Case 08-13555 ch 11 (scc)), ECF No. 52242		